

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA)	
Plaintiff)	
)	
V)	4:19CR01051-HEA
)	
JALEN SIMMS)	
Defendant)	

OBJECTIONS TO PRESENTENCE REPORT

Comes now the defendant, Jalen Simms, by and through his attorney Philip Eisenhauer and objects to some contents contained in paragraph 48 of the preliminary police.

Paragraph 48 contains language stating “When police searched and arrested Simms at his apartment, they found the license plate and ammunition that matched the casings at the scene.” This statement is factually incorrect as the defendant was arrested in Chesterfield Missouri on a parole hold on November 2nd 2019 and remained at the St. Louis County Justice Center until November 13, 2019 when he was transported back to the Missouri Department of Corrections on the pending parole hold. The search was conducted on November 4, 2019 two days after his arrest on November 2nd 2019. Therefore, the statement that the defendant was arrested at his apartment is erroneous and should be edited to reflect that he was in custody at the time of the execution of the search warrant.

Respectfully submitted,

/s/Philip Eisenhower #39045

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Certificate of Service

Signature above is also certification that a copy of the foregoing was electronically filed with the Clerk of the Court and a copy delivered to all parties of record through the Court's electronic filing system this 7th day of October 2022